

Application No. 09/707.624

REMARKS

No amendments have been made.

The rejection of Claims 1-13 under 35 U.S.C. § 102(e), as being anticipated by U.S. Patent No. 5,892,554 issued to DiCicco et al. (hereinafter "*DiCicco*"), is respectfully traversed.

To anticipate a claim, each and every limitation must be found in a reference. In addition, "[t]he identical invention must be shown in as complete detail as is contained in the claims" and "[t]he elements must be arranged as required by the claim." *Richardson v. Suzuki Motor Co.*, 9 USPQ 2d 1913, 1920 (Fed. Cir. 1989); *In re Bond*, 15 USPQ 2d 1566 (Fed. Cir. 1990); MPEP § 2131.

It is respectfully submitted that *DiCicco* does not disclose or even suggest each and every element of Claims 1-13. For example, *DiCicco* does not disclose or suggest "rendering, for each at least one target area, a target image based on at least a predefined three-dimensional model of the at least one target area" as recited by independent Claim 1, or "a model renderer for generating, a synthetic image based on a predefined three-dimensional reference model of a target area within a site from a known position of a camera" as recited by independent Claim 12.

The Examiner states column 12, lines 52-67, column 11, lines 39-52, and column 7, lines 61-63 of *DiCicco* disclose the limitations of independent Claims 1 and 12. (Office Action, pages 2-3). Applicant respectfully disagrees. *DiCicco* discloses a landmark mapping scheme where prominent features of a scene are used as landmarks for locating insertion regions within an image. (*DiCicco*, col. 6, lines 43-52). Landmarks comprise horizontal, vertical, diagonal, and corner features of a scene. (*DiCicco*, col. 6, lines 54-56). Each landmark is assigned an X,Y coordinate location as the reference location of the insertion region such that an insertion region may be selected by an operator by selecting a single X,Y coordinate location. (*DiCicco*, col. 7, lines 38-40, 45-50)(emphasis added). Thus, *DiCicco* discloses use of only a two-dimensional reference array for determining insertion regions within a scene. It does not disclose or suggest "rendering, for each at least one target area, a

Application No. 09/707,624

target image based on at least a predefined three-dimensional model of the at least one target area", as recited by Claim 1 (emphasis added), or "a model renderer for generating a synthetic image based on a predefined three-dimensional reference model of a target area within a site", as recited by Claim 12 (emphasis added). Therefore, for at least these reasons, *DiCicco* does not anticipate independent Claims 1 and 12.

Claims 2-11 that depend from independent claim 1, and claim 13 that depends from independent claim 12, are also not anticipated by *DiCicco* because they include the limitations of respective independent claims 1 and 12 and add additional elements that further distinguish *DiCicco*. Therefore, Applicant respectfully requests that the rejection of claims 2-11 and 13 be withdrawn.

For the foregoing reasons, Applicant respectfully requests that the rejection of claims 1-13 be withdrawn and that all pending claims be allowed.

No fee is believed due with this Response. However, the Commissioner is hereby authorized to charge any fees that may otherwise be due with this Response to Deposit Account No. 13-4900 of Munsch Hardt Kopf & Harr, P.C.

Respectfully submitted,



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